

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

MICHAEL DONALDSON,

Plaintiff,

v.

TRAE FUELS, LLC., et al.

Defendants.

Case No.: 3:18CV00097

**CONSENT MOTION TO ENLARGE TIME WITHIN WHICH
DEFENDANTS MAY FILE RESPONSIVE PLEADING**

Defendants Trae Fuels LLC and Envirotech Services, Inc., with the consent of Plaintiff Michael Donaldson, hereby respectfully move for an enlargement of time within which to file a responsive pleading in this matter. In support of the motion, Defendants state the following:

1. Plaintiff filed this action on October 10, 2018.
2. Defendant Trae Fuels was served with the summons and complaint on October 24, 2018. Pursuant to Fed. R. Civ. P. 12(a), Defendant Trae Fuels' responsive pleading is due on or before November 14, 2018.
3. Defendant Envirotech Services, Inc. was served with the summons and complaint on October 23, 2018. Pursuant to Fed. R. Civ. P. 12(a), Defendant Envirotech Services' responsive pleading is due on or before November 13, 2018.
4. Based on the nature and length of the Complaint, the time required by undersigned counsel to investigate and prepare a responsive pleading, and the

availability of Defendants' representatives, the Defendants respectfully move for a two-week enlargement of time within which to file their responsive pleading.

5. Undersigned counsel has consulted with Plaintiff's counsel who has consented to the relief sought in this motion.

WHEREFORE, based upon the foregoing, Defendants request an enlargement of time to file a responsive pleading up to and including November 28, 2018.

Respectfully submitted,

/s/ Jackson S. Nichols

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CERTIFICATE OF SERVICE

This is to certify that I have on November 12, 2018 served all the parties in this case with this **CONSENT MOTION TO ENLARGE TIME WITHIN WHICH DEFENDANTS MAY FILE RESPONSIVE PLEADING** in accordance with the notice of electronic filing (“ECF”), which was generated as a result of electronic filing in this court.

/s/ Jackson S. Nichols

Jackson S. Nichols, Esq.